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RECEIVED

OCT 24 2014

PUBLIC SERVICE
COMMISSION

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October 24, 2014

Jeff DeRouen
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40601

**RE: *Time Warner Cable Information Services (KY) Petition Requesting
the Commission's Intervention in NANPA NXX Code Assignments
for Faubush, KY (606-426)
Case No. 2014-00 _____***

Dear Mr. DeRouen:

Enclosed please find an original and ten copies of Time Warner Cable Information services Petition Requesting the Commission's Intervention in NANPA NXX Code Assignments for Faubush, KY.

Please indicate receipt of this filing by placing your file stamp on the extra copy and returning to me via our runner.

Very truly yours,

STOLL KEENON OGDEN PLLC

Douglas F. Brent

DFB:jmp

Enclosures

109917.128040/1151357.1

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In re the Matter of:

**TIME WARNER CABLE INFORMATION)
SERVICES (KY) PETITION REQUESTING)
THE COMMISSION'S INTERVENTION IN)
NANPA NXX CODE ASSIGNMENTS FOR)
FAUBUSH, KY (606-426).)**

CASE NO. _____

PETITION FOR ACCESS TO NUMBERING RESOURCES

Time Warner Cable Information Services (KY), LLC ("TWCIS") petitions the Kentucky Public Service Commission ("Commission") pursuant to 47 C.F.R. § 52.15(g)(4) and Section 11.1 of the Thousands-Block Number (NXX-X) Pooling Administration Guidelines (ATIS-0300066, September 5, 2014), to overturn the Pooling Administrator's ("PA") decision to withhold numbering resources from the carrier. As shown below, TWCIS has complied with the reporting and numbering resource application requirements, and is entitled to relief necessary for it to serve voice customers within its Kentucky service area.

TWCIS is the code holder for NPA-NXX 606-426 (Faubush, Kentucky) and had been assigned a single 1,000 number block within the NXX when it entered the voice service market in the associated rate center. TWCIS returned this thousands-block to the PA earlier this year, as there were no TWCIS subscribers being served on the block and return was appropriate under the PA Guidelines. At the time TWCIS returned the code it was providing voice services in the Faubush rate center, which includes Nancy, Kentucky and an area near Somerset.

As would be typical for a new entrant, the voice service customers requesting service from TWCIS's cable company affiliate generally desire to port an existing telephone number associated with an incumbent provider. This was true in the area of Pulaski County rate-centered

on Faubush, where Time Warner Cable competes with Windstream Kentucky. However, TWCIS must also have its own numbering resources to serve new customers requesting voice service in this rural rate center. An example would be a customer moving into Pulaski County who cannot port their number from a distant rate center. TWCIS attempted to reorder a thousand block within 606-426 to meet the need, but the PA rejected the request, claiming the entire NPA-NXX is in reclamation status. *See Exhibit One.*

Denial of numbering resources is a barrier to local voice competition in Kentucky. The Federal Communications Commission addressed this multiple times in the *Local Competition* proceeding when it considered how to optimize access to numbering. “Under no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources. For consumers to benefit from the competition envisioned by the 1996 Act, it is imperative that competitors in the telecommunications marketplace face as few barriers to entry as possible.” *E.g., In the Matter of Numbering Resource Optimization*, 16 FCC Rcd. 3479 (2001).

The Administration Guidelines contemplate that disagreements may arise between the PA and Block Holders/Applicants related to administration of the guidelines. Accordingly, the guidelines require reasonable, good faith efforts to resolve disagreements prior to pursuing any appeal. TWCIS and the PA have fulfilled that requirement. On October 3, 2014 the PA Manager advised TWCIS “[i]f you now need resources from FAUBUSH you will need to contact the KY commission and ask them to give us permission to assign you a block from 606-426 since it is on the reclamation list.” This Petition is thus required.

WHEREFORE, Time Warner Cable Information Services (KY) respectfully request that the Commission grant this petition and order the PA to allocate a thousands-block in NPA-NXX 606-426 to TWCIS.

Dated: October 23, 2014

Respectfully submitted



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Counsel to Time Warner Cable Information
Services (KY) LLC

EXHIBIT ONE

Pooling Administration System

Dated 03-October-2014

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 606-FAUBUSH-KY-766107

Date of Application: 09/30/2014 Effective Date: _____

Date of Receipt: 09/30/2014 Date of Response: 10/03/2014

Service Provider Name: TIME WARNER CBL INFO SV (KY) DBA TIME WARNER-KY

(Telcordia TM LERG TM Routing Guide) OCN: 698F

Parent Company OCN: 575C

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Genevieve Bettiga Phone: 925-363-7652

Signature of Pooling Administrator

Genevieve Bettiga Fax: 925-363-7683

Name (print)

Email: genevieve.bettiga@neustar.biz

NPA-NXX or
NPA-NXX-X : _____

Block Assigned: _____

Block Reserved : _____

Block Reservation
Expiration Date : _____

Block/Code _____

Modified : _____

Block/Code
Disconnected : _____

Block Contaminated(Yes or No) :

If Yes,enter the number of TNs contaminated :

Switch Identification(Switch Entity/POI): ¹

Rate Center:

Rate Center Sub Zone:

SMRTKYXANMD

FAUBUSH

Form Complete, request denied.

Explanation:

If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

DR-06: Currently there are no blocks available in the pool in which you are requesting resources from. The pool will need to be replenished to meet your request for a thousands-block. Please submit a CO Code application for pool replenishment in PAS.

Request withdrawn.

Explanation:

Assignment activity suspended by the administrator.

Explanation:

Remarks:

Block Denied.

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

